



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 7, 2021

**BY ECF AND EMAIL**

Hon. John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street New York, New York 10007

**Re: United States v. Arthur Hayes, et al., 20 Cr. 500 (JGK)**

Dear Judge Koeltl:

Yesterday evening, the Government submitted to the Court's chamber email address, and copying defense counsel for the above-referenced defendants, a response to the defendants' two June 4, 2021 motions to compel. The Government informed the defendants that it intended to file this response under seal, pending proposed redactions, namely to redact references to materials which the Government has produced to the defendants and designated as "Confidential" or "Sensitive" pursuant to the protective orders that have been entered in this case. The Government therefore respectfully seeks leave from the Court that the response remain under seal, at the present time, while the parties confer on proposed redactions.

The Government is available at the Court's convenience to discuss any questions.

Very truly yours,

AUDREY STRAUSS  
United States Attorney

by: /s  
Samuel Raymond  
Jessica Greenwood  
Assistant United States Attorneys  
(212) 637-6519

cc: Defense Counsel (via ECF)